

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

JEFFREY BLEVINS, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

CAPITAL ALLIANCE GROUP,

Defendant.

Case No: 2:18-cv-00361-EAS-KAV

DECLARATION OF NARIN CHARAN IN
SUPPORT OF DEFENDANT'S MOTION FOR
RELIEF FROM DEFAULT

Hon. Judge Edmund A. Sargus
Hon. Magistrate Kimberly A. Jolson

I, Narin Charanvattanakit ("Charan"), declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am over 21 years of age and competent to make this Declaration,.
2. I am the Chief Executive Officer of Capital Alliance Group ("Capital Alliance" or "Defendant"), and have held this position since 2008.

3. As Capital Alliance's CEO, I am familiar with its business operations, including the processes and procedures for making telephone calls to potential customers, and the equipment used. As such, I make this Declaration based upon my own personal knowledge of the facts set forth herein, as well as my review of the books and records available to me that are kept in the ordinary course of operating Capital Alliance's business. If called upon to testify as to the facts set forth in this Declaration, I could and would competently do so.

4. Capital Alliance has been struggling financially since 2016. Capital Alliance has negative net revenues, so incurring additional legal costs make continuing as a going concern increasingly difficult.

5. When I was served with the Complaint, I noticed that Plaintiff Jeffrey Blevins ("Plaintiff") alleged he received a single call from Capital Alliance. It was my understanding that failing to respond to the Complaint would allow Plaintiff to obtain a judgment for his maximum amount of alleged damages, or \$1,500. I compared this against the cost of retaining Capital Alliance's attorney to defend this action, and made an economic decision that it would be more cost effective to pay a default judgment. I was unaware that Plaintiff could seek, and potentially obtain a default judgment on behalf of a class.

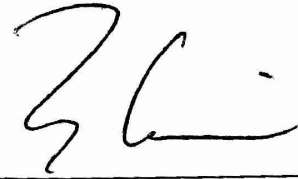
6. I first discussed this litigation with Capital Alliance counsel William Restis on June 28, 2018. After consultation with counsel, I understood for the first time that Plaintiff could seek, and in fact intends to seek, a class action default judgment.

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7. Upon learning this fact, I immediately retained Mr. Restis to appear and defend this action.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed in Santa Ana, California on July 13, 2018.



Narin Charanvattanakit